

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**MOTION TO WITHDRAW AND TERMINATE APPEARANCE OF
FANCA OBJECTORS AND THEIR COUNSEL**

Undersigned counsel for the Faneca Objectors – Steven F. Molo, Thomas J. Wiegand, Rayiner I. Hashem, and Eric R. Nitz of MoloLamken LLP; William T. Hangley and Michele D. Hangley of Hangley Aronchick Segal Pudlin & Schiller; and Linda S. Mullenix – respectfully request that the Court withdraw and terminate the appearances of the Faneca Objectors¹ and the Faneca Objectors' counsel pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and Local Civil Rule 5.1(c), and state as follows:

¹ The Faneca Objectors include Alan Faneca, Jeff Rohrer, Roderick Cartwright, Sean Considine, Sean Morey, Robert Royal, and Ben Hamilton.

1. In May 2014, the Faneca Objectors, through counsel, appeared before this Court for the sole purpose of advocating for improvements to the class settlement. Dkts. 6019, 6040-6045. This Court approved that settlement on April 22, 2015, Dkts. 6509-6510, and the settlement is several years into its implementation, *see* Dkts. 11274-11276. On November 13, 2020, this Court granted the Consent Motion of the Faneca Objectors (Dkt. 11181) and awarded the Faneca Objectors' counsel attorneys' fees. Dkt. 11230. The Court further ordered MoloLamken LLP and Hangley Aronchick Segal Pudlin & Schiller to "cooperate with the Administrator of the AFQSF to effectuate this Order." *Id.* at 1. MoloLamken LLP and Hangley Aronchick Segal Pudlin & Schiller have complied with that Order.

2. The Faneca Objectors and their counsel thus have no pending controversy or business before the Court in this matter.

3. Accordingly, the withdrawal of appearances of counsel and termination of appearances of the Faneca Objectors "can be accomplished without material adverse effect on the interests of the" Faneca Objectors in this matter. Pa. R. Prof. Conduct 1.16(b)(1).

WHEREFORE, the undersigned respectfully request that the Court terminate and grant the withdrawal of all appearances entered in this action on behalf of the Faneca Objectors.

Dated: February 12, 2021

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Respectfully Submitted,

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Counsel for the Faneca Objectors

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2021, I caused the foregoing Motion To Withdraw and Terminate Appearance of Faneca Objectors and Their Counsel to be filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties.

/s/ Steven F. Molo